

KING & SPALDING

King & Spalding LLP
1185 Avenue of the Americas
New York, NY 10036-4003

Main: (212) 556-2100
Fax: (212) 556-2222
www.kslaw.com

William F. Johnson
Direct Dial: (212) 556-2125
Direct Fax: 212-556-2222
wjohnson@kslaw.com

June 16, 2015

By ECF

Honorable Jesse M. Furman
United States District Judge
United States District Court
Southern District of New York
40 Foley Square, Courtroom 1105
New York, NY 10007

Re: United States v. Wells Fargo Bank, N.A., et al., No. 12-CV-7527 (JMF) (JCF)

Dear Judge Furman:

We represent Wells Fargo Bank, N.A. (“Wells Fargo”) in the above-referenced action (the “Action”), and submit this application pursuant to Paragraph 19 of the March 21, 2014 Protective Order (Dkt. 97).

On June 2, 2015, Wells Fargo served its Memorandum of Law in Opposition to the United States of America’s Motion to Reopen Fact Discovery and Compel the Production of Documents (“Wells Fargo’s Opposition”), along with the June 2, 2015 Declaration of Eric A. Hirsch in support of the same (“Hirsch Declaration”), and notified the other parties to the Action of certain proposed redactions to those papers pursuant to the Protective Order. Specifically, as reflected in the version of the papers provided to the Court via email on June 2, the proposed redactions are as follows:

- Wells Fargo’s Opposition, page 20 (summarizing certain of Kurt Lofrano’s deposition testimony);
- Hirsch Declaration Exhibit B (an internal memorandum concerning Wells Fargo’s self-reporting process);
- Hirsch Declaration Exhibit C (an internal email concerning Wells Fargo’s self-reporting process); and

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- Hirsch Declaration Exhibit L (a letter to the HUD Director of Quality Assurance self-reporting on a probable fraud).

These materials have been properly designated as Confidential as they reflect non-publicly disclosed business plans or internal policies or procedures. *See* Protective Order (Dkt. 97) ¶ 4(c). Pursuant to the Protective Order, the other parties to the Action had seven days to oppose Wells Fargo's proposed redactions or propose any additional redactions (and fourteen days to seek a meet and confer if necessary).

Neither the Government nor Mr. Lofrano have expressed any disagreement with Wells Fargo's proposed redactions, proposed any additional redactions, or sought a meet and confer session to discuss those redactions with Wells Fargo within the fourteen-day period called for by the Protective Order.

Accordingly, Wells Fargo respectfully requests that it be permitted to file the Wells Fargo Opposition in redacted form as indicated above, and that Exhibits B, C and L to the Hirsch Declaration be filed under seal.

Respectfully submitted,

KING & SPALDING LLP

BY: /s/ William F. Johnson
William F. Johnson
Attorneys for Wells Fargo Bank, N.A.

cc: Jeffrey Oestericher, Esq.
Meredith Kotler, Esq.